## Grandinetti, Robert

From: Lopez, Maria

Sent: Thursday, February 25, 2016 7:13 AM

To: Werntz, James

Cc: Stoll, Pat; Kenknight, Jeff; Lidgard, Michael; Grandinetti, Robert; Keenan, Dru; Poulsom,

Susan

Subject: RE: Call related to Syringa Mobile Home Park: Wastewater Lagoon Issue

## Hi Jim,

I spoke with Mr. Carley today. He stated that they are working hard to not have a discharge and further mentioned that they have not discharged to-date. He has been in close contact with IDEQ to find a short-term and long-term fix for their wastewater issues. Mr. Carley believes that some of the capacity issues are as a result of runoff/snowmelt and is working with his engineer to find the source of the flow and a way to divert it. I mentioned to Mr. Carley that he still needed to supply NPU with additional information that is necessary to proceed with any type of permit issuance. I further mentioned that there could be challenges to authorizing this discharge through an NPDES permit due to receiving water limitations so they really need to have a Plan B if they don't get permit coverage. I mentioned he should contact Dru or Susan to address the missing information on the permit application. I also mentioned that he should coordinate with ICL and inform them of progress, etc. and their plans to move forward and address their issues. He was very receptive to the information and wants to fix the negative associations with the Park. I let him know that EPA doesn't give the OK to discharge without a permit so they have to use their judgement to do what's necessary in a way that is protective of public health and the environment which would mean coordination with IDEQ and the Health Department if they do have an overflow.

I informed him that I would be out of the country after next week and so I will suggest he speak or e-mail Susan and Rob (I hope that is okay) should he have additional questions. Jim, you are correct that he wants to do the right thing, so I suggested he keep IDEQ, ICL, and EPA informed should he have a discharge.

Let me know if you need more.

## Maria

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From: Werntz, James

Sent: Tuesday, February 23, 2016 4:46 PM

To: Lopez, Maria

Cc: Stoll, Pat; Kenknight, Jeff; Lidgard, Michael

Subject: Call related to Syringa Mobile Home Park: Wastewater Lagoon Issue

Maria: You should expect a call from Neil Carley (sp?) 971-706-9178 (cell). I spoke with him yesterday. This Park near Moscow, as I'm sure you recall, was mismanaged on both DW and WWT sides. ICL sued for the direct discharge problem and won. The Park is in bankruptcy now, and a new owner is apparently (according to Mr. Carley) trying to fix up the Park and associated infrastructure.

Mr. Carley is the General Mgr for the new owner, and was reporting to us that the wastewater lagoon had developed a leak/breach and are experiencing some overflow. He said it is not discharging to the receiving water, but it sounds as though they have a structural integrity problem. They also notified Michael Camin, DEQs Lewiston Office, of the problem.

Mr. Carley seemed to want our help, and possibly an emergency discharge exemption, so they can reduce the head on the lagoon. I told him these are rarely granted. I suggested pumping out the lagoon into tankers for haul/treat, but apparently this is not an option. I emphasized that they should avoid discharge under any circumstance, and suggested they get a licensed engineer to assess the situation.

Mike – Mr. Carley also asked about their request to get an NPDES permit – sounds like it may have been in our que for a few years...

My sense is that they really want to do this properly, but have limited options and resources available due to bankruptcy limitations.

I would like you to call him when you get back to Boise. If your Peru obligations prevent this, perhaps Jeff might ask another OCE staffer to follow-up. Please keep me posted. Thank you.

Jim

James H. Werntz Director, EPA-Idaho Operations 950 W. Bannock Street, Suite 900 Boise, Idaho 83702 (208) 378-5743